

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**SHAVADA WHEELER, Individually  
and for Others Similarly Situated,  
Plaintiff,**

V.

**vTECH HEALTHCARE, INC.,**

**Defendant.**

**Case No.: 1:22-cv-561 (PTG)**

**NOTICE OF WITHDRAW OF MOTION TO DISMISS**

Defendant, vTech Healthcare, Inc. (“vTech”), by and through undersigned counsel, hereby withdraws Defendant’s Motion to Dismiss for Lack of Subject Matter Jurisdiction. *See* ECF 23.

Date: July 27, 2022

Respectfully Submitted,

/s/ Samuel W. Hughes

Samuel W. Hughes  
Clark Law Group, PLLC  
1100 Connecticut Ave, NW, STE 920  
Washington, DC 20036  
Phone: 202-293-0015  
Email: [shughes@benefitcounsel.com](mailto:shughes@benefitcounsel.com)  
*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 27, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically sends the foregoing via email to:

Craig J. Curwood  
Zev H. Antell  
Paul Falabella  
Butler Curwood, PLC  
140 Virginia Street, Suite 302  
Richmond, Virginia 23219  
804-649-4848 – Telephone  
804-237-0413 – Facsimile  
Email: [craig@butlercurwood.com](mailto:craig@butlercurwood.com)  
[zev@butlercurwood.com](mailto:zev@butlercurwood.com)  
[paul@butlercurwood.com](mailto:paul@butlercurwood.com)

Philip Boher  
[phil@bohrerbrady.com](mailto:phil@bohrerbrady.com)  
Scott E. Brady  
[scott@bohrerbrady.com](mailto:scott@bohrerbrady.com)

Boher Brady, LLC  
8712 Jefferson Highway, Suite B  
Baton Rouge, Louisiana 70809  
Telephone: (225) 925-5297  
Facsimile: (225) 231-7000  
*Attorneys for Plaintiff*

/s/ Samuel W. Hughes  
Samuel W. Hughes